

## **Remarks**

Reconsideration and reexamination of the above-identified patent application are respectfully requested. Claims 1-3, 5-8, and 10-11 are pending in this application. Of the pending claims, claims 1, 6, and 11 are the only independent claims.

### **Claim Rejections - 35 U.S.C. § 103**

In the final Office Action mailed January 17, 2006, the Examiner rejected claims 1-3, 5-8, and 10-11 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,235,328 issued to Kurita (Kurita) in view of U.S. Patent Application Publication No. 2002/0067826 issued to King (King). The Applicant respectfully traverses the rejection and believes that the claimed invention is patentable under 35 U.S.C. § 103(a) over Kurita and King.

#### **1. The Claimed Invention**

The claimed invention, as set forth in independent claims 1, 6, and 11, is directed to a keyless authorized access control system operable for communicating with transceivers assigned to objects, and to an identification (ID) device for such a system. As set forth in representative independent claim 6, the ID device includes a base module (BM) and at least two object modules (OMs). The BM has at least two interfaces and is operable to communicate commands to the transceivers assigned to the objects. Each OM is assigned to a respective one of the objects. Each OM has a memory chip containing a code attuned to the assigned object. Each OM is interchangeably connected to the BM through a respective one of the interfaces such that a first one of the OMs is interchangeably connected to the BM through a first one of the interfaces while a second one of the OMs is interchangeably connected to the BM through a second one of the interfaces. Each OM has a button operable for activating the BM to communicate to the transceiver assigned to the object that is assigned

to the OM a command having the code attuned to the assigned object when the OM is connected through the respective one of the interfaces to the BM.

## **2. Kurita and King**

The Examiner posited that Kurita discloses a keyless authorized access control system comprising an ID device (i.e., a remote commander; Fig. 1) having a BM (1) (i.e., a commander main body) operable to communicate commands to transceivers assigned to objects (col. 3, lines 30-43; col. 4, line 59 to col. 5, line 34; Figs. 1 and 5). The Examiner posited that the ID device has at least two OMs (2) (i.e., ROM and RAM cards), each OM (2) being assigned to a respective object (col. 3, lines 30-64; col. 4, lines 35-64; Figs. 1-7), each OM (2) having a memory chip (30) containing a code attuned to the assigned object (col. 5, lines 21-34; Figs. 6-9). The Examiner further posited that each OM (2) is interchangeably connected to the BM (1) through an interface (16) (col. 4, line 65 to col. 5, line 7; Figs. 5 and 8-9); and that each OM (2) has a button (32) (i.e., a key switch) operable for activating the BM (1) to communicate to the transceiver assigned to the object that is assigned to the OM (2) a command having the code attuned to the assigned object when the OM (2) is connected through the interface (16) to the BM (1) (col. 5, line 21 to col. 6, line 50; col. 7, lines 1-48; Figs. 8-9).

The Examiner indicated that Kurita does not explicitly disclose that the BM (1) has at least two interfaces and each OM (2) is interchangeably connected to the BM through a respective one of the interfaces such that a first one of the OMs is interchangeably connected to the BM through a first one of the interfaces while a second one of the OMs is interchangeably connected to the BM through a second one of the interfaces.

The Examiner posited that King discloses a BM (12) having at least two interfaces (22) (i.e., connectors having sockets 20) and each OM (14a to 14e) is interchangeably connected to the BM (12) through a respective interface (22) such that a first one of the OMs (14a) is interchangeably connected to the BM (12) through a first one of the

interfaces (i.e., a first connector) while a second one of the OMs (14b) is interchangeably connected to the BM (12) through a second one of the interfaces (i.e., a second connector).

The Examiner posited that one of ordinary skill in the art recognizes the need to have a plurality of electrical connectors to interface with a plurality of removable plug-in data modules taught by King in a remote commander main body of Kurita because Kurita suggests it is desired to provide that the remote commander main body include a plurality of connectors to connect with a plurality of cards so that each card can be interchanged (col. 3, line 51 to col. 4, line 48; Fig. 1 of Kurita) and King teaches that the trainable transmitter body has at least two electrical connectors for a plurality of interchangeable memory cards (paragraphs 0010-0018; Fig. 1 of King) in order to provide convenience compatibility with home products. The Examiner then posited that thus it would have been obvious to one of ordinary skill to have a plurality of electrical connectors to interface with a plurality of removable plug-in data modules taught by King in a remote commander main body of Kurita with the motivation for doing so being to provide convenience to the consumer by allowing the remote command apparatus to operate with a plurality of cards.

### **3. The Claimed Invention Compared to Kurita and King**

As indicated above, the claimed invention of the ID device has a BM and two OMs assigned to respective objects in which the BM has two interfaces, each OM is interchangeably connected to the BM through a respective one of the interfaces such that a first OM is interchangeably connected to the BM through a first one of the interfaces while a second OM is interchangeably connected to the BM through a second one of the interfaces, and each OM has a button operable for activating the BM to communicate to the transceiver assigned to the object that is assigned to the OM a code attuned to the assigned object when the OM is connected through the respective one of the interfaces to the BM. As such, two OMs may be connected to the BM at the same time such that an operator can operate the button of the first OM to activate the BM to communicate with the first object and operate the button of the

second OM to activate the BM to communicate with the second object without having to substitute either OM for one another.

Kurita discloses that a problem associated with a remote control for controlling a single electronic device is that a first operator of the remote control may desire to have the operator keys of the remote control in a first arrangement while a second operator of the remote control may desire to have the operator keys in a second arrangement (col. 1, line 13-41). Kurita discloses that a single remote control having multiple operator keys can control various electronic devices, instead of a number of remote controls, and that a problem with the single remote control is that an operator's remote control efficiency is low as a result of having to navigate the multiple operator keys (col. 1, line 60 to col. 2, line 16). In order to overcome these problems, Kurita discloses that only one OM (2) is electrically connected to the remote control (1) at a time with other OMs being stored in the remote control for future use (col. 3, line 51 to col. 4, line 48; Fig. 1 of Kurita; "It is understood that only one such card is electrically connected to the circuitry of commander main body 1, with the other cards simply being stored for future use." (col. 4, lines 12-14).) Consequently, the arrangement of the operator keys of the remote control can be freely configured or set in accordance with the wishes of each operator (col. 2, lines 20-27) with the number of operator keys on the remote control being minimized such that an operator's efficiency in using the remote control is improved (col. 2, lines 28-31).

As indicated above, the Examiner posited that it would have been obvious to have a plurality of connectors to interface with a plurality of removable plug-in data modules taught by King in a remote control of Kurita with the motivation for doing so being to provide convenience to an operator by allowing the remote control to operate with a plurality of OMs (at the same time for controlling multiple devices such as home products). However, as indicated above, Kurita discloses that a single remote control having multiple operator keys for controlling multiple devices is known but that a problem is that an operator's remote control efficiency is low as a result of having to navigate the multiple operator keys. Kurita overcomes this problem by electrically connecting one OM at a time to the remote control. As a result,

modifying the remote control of Kurita such that at least two OMs are electrically connected at a time to the remote control would defeat the purpose of Kurita as the number of operator keys of the remote control would not be minimized and loss of operator efficiency in using the remote control may accrue. Accordingly, the proposed modification of modifying the remote control of Kurita such that multiple OMs are electrically connected at a time to the remote control would render the remote control of Kurita unsatisfactory for its intended purpose. As set forth in MPEP § 2143.01(V), "If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed.Cir.1984). Thus, the motivation for making this modification is lacking.

Thus, the Applicant believes that the claimed invention as set forth in independent claims 1, 6, and 11 is patentable under 35 U.S.C. § 103(a) over Kurita and King. Claims 2-3, 5, 7-8, and 10 depend from one of the independent claims and include the limitations therein. Accordingly, the Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims under 35 U.S.C. § 103(a).

### **CONCLUSION**

In summary, claims 1-3, 5-8, and 10-11 meet the substantive requirements for patentability. The case is in appropriate condition for allowance. Accordingly, such action is respectfully requested.

If a telephone or video conference would expedite allowance or resolve any further questions, such a conference is invited at the convenience of the Examiner.

Respectfully submitted,

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